



Michael J. Willemin

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May 21, 2024

VIA ECF

The Honorable Jessica G. L. Clarke
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Parker v. Bursor et al., Civil Case No.: 1:24-cv-00245-JGLC-RFT

Dear Judge Clarke,

We represent Plaintiff in this action and write in connection with the Court's May 21, 2024 Order concerning a briefing schedule for Defendants' motion to dismiss and/or to strike.

Defendants' motion was filed on May 13, 2024. Accordingly, Plaintiff had until May 23, 2024 to determine whether she intended to amend the Complaint in response to Defendants' motion. See Individual Rule 4(c). While in the process of making that decision, we sought Defendants' consent to a deadline of June 17, 2024 to oppose the motion (in the event we did not intend to file an amended complaint). Defense counsel consented to this request and requested a reply deadline of July 2, 2024. This agreement was made on May 16, 2024, but we had not yet filed the extension request because we were finalizing a decision on a potential amended complaint. Last night, we informed defense counsel that we were not going to amend. As such, we intended to make the extension request today, but Your Honor's Order was issued before we did so.

In short, while we recognize that these are not likely the sort of "extraordinary circumstances" contemplated by your order, we respectfully request at least a one-week extension of the deadline set by the Court, from May 28, 2024 to June 4, 2024. This request, which is still two weeks shorter than the deadline consented to by Defendants, is made because counsel has outside obligations over Memorial Day weekend. As such, the deadline set by the Court (the Tuesday after Memorial Day weekend) would be very difficult to meet given the length of the motion to dismiss (46 pages) and the 80 page chart annexed to it.



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We thank the Court for its time and consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. J. Willemin". The signature is written over the printed name.

Michael J. Willemin

Cc: All counsel of record *via* ECF